



August 18, 2016

Reference No. 054046

Mr. Bradley Roberts  
U.S. Environmental Protection Agency  
Air and Waste Management Division  
Waste Remediation and Permitting Branch  
11201 Renner Boulevard  
Lenexa, Kansas 66219

**Re: Response to Comments  
Vapor Intrusion Investigation Work Plan  
Occidental Chemical Corporation  
6200 S. Ridge Road, Wichita, Kansas  
RCRA ID #: KSD007482029**

Dear Mr. Roberts:

GHD Services, Inc. (GHD) on behalf of Glenn Springs Holdings, Inc. (GSH) for the Occidental Chemical Corporation (OCC) Wichita Facility has prepared responses to the United States Environmental Protection Agency (U.S. EPA) email dated July 27, 2016. For ease of your review, U.S. EPA's comments are reiterated below in bold italic print followed by our response.

**U.S. EPA General Comment:**

*They note several documents addressing the off-site VI investigation but don't summarize the findings other than to note EPA indicated there was not a concern. Figure 1 depicts soil gas samples were collected near 7 of 13 structures at depths of 15 ft and 25 ft. They indicate access issues; however, at a minimum these samples could be collected from the public ROW. Those five documents weren't reviewed but at a minimum soil gas samples should be collected in the public ROW near the remaining occupied structures from a depth of either 5 ft or 8 ft, if the structure has a basement. If monitoring wells are present in the area of the homes, detected COC concentrations, with the proper groundwater temperature, could be used in the VISL calculator to determine the potential for IA concerns. This would provide an additional line of evidence in evaluating the potential for risks to human health from VI.*

**Response:**

OCC and GSH will attempt to collect soil gas samples in the public Right-of-Way near the remaining six occupied structures. The construction of the soil gas probes and subsequent sampling will be consistent with the procedures outlined in the EPA-approved On-Site Vapor Intrusion Work Plan. The results of this new investigation (sampling locations, sample depth and laboratory analytical results)

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RCRA



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will be summarized along with the historic off-site soil gas investigation data, incorporated into the VISL calculator, and summarized with the historic soil gas investigation data.

**U.S. EPA Comment #2:**

***The RTC indicates because pressure monitoring has demonstrated that the exposure controls are operating as intended, additional sampling of indoor air is not necessary. Section 8.2.1, Page 145, Paragraph 1, Bullet 2 of the 2015 VI Guidance indicates "EPA recommends appropriate monitoring of pressure and other indicators (e.g., indoor air monitoring) be conducted to ensure that adequate pressurization is sustained throughout areas of the building that could be subject to vapor intrusion".***

**Response:**

The basis and initial implementation of the Vapor Intrusion Interim Corrective Measure (VI ICM) is described in the "On-Site Vapor Intrusion Investigation, Assessment, and Interim Corrective Measures Implementation" report dated 2009 (Conestoga-Rovers & Associates [CRA] 2009). The goal of the VI ICM is to minimize the potential for building occupants to be exposed to chemicals present or potentially present in soil gas beneath the buildings. The VI ICM report established a differential pressure design goal of 0.016 inch of water column (WC) and a minimum effective differential pressure of 0.001 inch WC.

In April 2010, Occidental Chemical Corporation commissioned a pressure study to provide information for the development of a pressure monitoring network (On-Site Vapor Intrusion Mitigation Interim Corrective Measures Construction Completion Report, CRA, August 2011). The pressure study determined the existing air handling units were meeting the design pressure goals; however, the air handling units were near the end of their useful service life and were replaced in November 2010. In addition to the replacement of the air handling units in the Administration Building, several maintenance projects were performed as part of the VI ICM implementation to improve the performance of the building envelope. These projects (CRA August 2011) included:

- Sealing ventilation grates present near the top of the exterior walls of the old portion of the Administration Building;
- Sealing the louvered grate in the east basement mechanical room;
- Replacing the overhead walkway door and frame; and,
- Removing door stops from exterior doors.

The integrity of slab floors and basement walls was improved via several maintenance projects (CRA August 2011) including:

- Sealing cracks in the floor and walls;
- Sealing below-grade wall penetrations; and,
- Closing and sealing the unused chimneys in the east basement mechanical room.

An Operation and Maintenance (O&M) Plan has been developed to ensure the ICM remains effective (CRA 2010). The O&M Plan was approved by the United States Environmental Protection Agency by letter dated January 2011. Key components of the O&M Plan include:

- Heating, Ventilation and Air Conditioning (HVAC) performance and maintenance goals;
- Building envelope changes;
- Quarterly building inspections of the building envelope and floors; and,
- Quarterly pressure monitoring using a digital differential pressure meter.

OCC has performed quarterly building envelope inspections and differential pressure monitoring since June 2011 as part of the VI IVM O&M Plan; and the building differential pressure has been within design parameters. Each quarter, OCC provides the US EPA with a copy of the recent VI ICM O&M inspection and differential pressure monitoring results. A summary of the Administration Building air pressure differential monitoring is provided in Table 1.

Additionally, prior to the implementation of the VI ICM, OCC performed area and personal air monitoring in the Administration Building in January and February 2002. The results of the sampling are presented in Table 2.

While there were occasional detections of some of the Site Constituents of Concern (COCs) in the Administration Building, the detections were near the detection limit and below the workplace exposure limits. OCC and GSH believe the low concentrations of the detected COCs are consistent with concentrations which would be expected in an industrial setting and are not indicative of soil vapor intrusion.

OCC and GSH believe the Administration Building area monitoring performed in 2002 and the pre-ICM pressure studies performed in 2009 indicate soil gas was not intruding into the building and the resulting enhancements (new HVAC system, sealing penetrations, new exterior doors, routine pressure monitoring, etc.) during the ICM continue to prevent soil gas entry into the building. Therefore, since the ICM continues to meet design criteria (preventing soil gas entry through pressurization), OCC and GSH believe the collection of indoor air samples will not provide relevant information to support the ICM effectiveness.

Sincerely,

GHD

*Charles W. Janson*

Charles Janson

CJ/cm/34

Encl.

cc: Mostafa Kamal, KDHE  
David Anderson, Glenn Springs Holdings, Inc.  
Lisa Thurman, OCC, Wichita, Kansas

**Table 1**  
**Occidental Chemical Corporation Administration Building**  
**Indoor/Outdoor Air Pressure Differential Monitoring Summary**  
**Wichita, Kansas**

<b>Quarterly Sample Date</b>	<b>Second Floor (in WC)</b>	<b>Cafeteria (in WC)</b>	<b>Basement (in WC)</b>
6/10/2011	0.005	0.012	0.023
9/22/2011	0.033	0.013	0.011
10/31/2011	0.038	0.036	0.034
3/6/2012	0.058	0.061	0.023
5/8/2012	0.02	0.009	0.012
9/5/2012	0.006	0.018	0.014
11/12/2012	0.036	0.016	0.006
3/14/2013	0.027	0.027	0.024
6/10/2013	0.016	0.03	0.035
8/27/2013	0.011	0.014	0.01
12/27/2013	0.031	0.007	0.002
3/14/2014	0.031	0.014	0.007
6/20/2014	0.033	0.014	0.007
8/1/2014	0.026	0.017	0.028
11/24/2014	0.045	0.021	0.017
2/6/2015	0.041	0.035	0.021
5/11/2015	0.072	0.029	0.036
8/5/2015	0.044	0.028	0.042
11/20/2015	0.037	0.024	0.031
2/26/2016	0.051	0.029	0.02
6/6/2016	0.004	0.017	0.008

**Notes:**

in WC = inches Water Column

design minimum effective differential pressure is 0.001 in WC

design target differential pressure is 0.016 in WC

**Table 2**  
**Occidental Chemical Corporation Administration Building**  
**Area Air Sample Monitoring Summary**  
**Wichita, Kansas**

Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
01/23/02	W14435.0	Methyl Chloride	<0.05 ppm	100.00	50.00	6 feet south of Room 16 door and about 3 feet 6 inches above the floor.
01/23/02	W14433.0	Methyl Chloride	<0.05 ppm	100.00	50.00	On asbestos warning sign left of door for room 28 and about 4 feet above floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.06 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/23/02	W14434.0	Methyl Chloride	<0.05 ppm	100.00	50.00	About 3 feet above sump in Room 28, in the northeast corner in room.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.06 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/23/02	W14436.0	Methyl Chloride	<0.05 ppm	100.00	50.00	On emergency light fixture across the hall from Room 23 and about 3 feet six inches above the floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.06 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/23/02	W14437.0	Methyl Chloride	<0.05 ppm	100.00	50.00	In Room 14, 6 feet west and about 5 feet north of door and about 4 feet above the floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.06 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14438.0	Methyl Chloride	<0.05 ppm	100.00	50.00	In Room 24 at west wall south of pilaster and about 4 feet above the floor,
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.06 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14439.0	Methyl Chloride	<0.06 ppm	100.00	50.00	Across hall from Rooms 21A and 22, south of return air and about 3 feet above floor.
		Chloroform	<0.06 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.06 ppm	10.00	10.00	
		Perchloroethylene	<0.04 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14440.0	Methyl Chloride	<0.06 ppm	100.00	50.00	In Room 17 at northeast corner about 3 feet above the floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	

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Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
01/28/02	W14441.0	Methyl Chloride	<0.06 ppm	100.00	50.00	In Room 10 and centered on east wall and about 4 feet above the floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14442.0	Methyl Chloride	<0.06 ppm	100.00	50.00	On fire extinguisher cabinet outside Room 11A door and about 3 feet 6 inches above floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14443.0	Methyl Chloride	<0.06 ppm	100.00	50.00	Six feet south of Room 16 door and about 4 feet above the floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14444.0	Methylene Chloride	<0.06 ppm	100.00	50.00	In mechanical Room 27 at southeast corner on electrical transformer on east wall and about 3 feet above floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14445.0	Methylene Chloride	<0.06 ppm	100.00	50.00	Inside west HAVC room at the southwest corner of air handling unit and about 3 feet above floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/28/02	W14446.0	Methyl Chloride	<0.06 ppm	100.00	50.00	In froms roo on pipe labelled "Process Water" and about 3 feet above the floor.
		Chloroform	<0.05 ppm	10.00	10.00	
		Carbon Tetrachloride	<0.04 ppm	10.00	5.00	
		Perchloroethylene	<0.03 ppm	100.00	25.00	
		Methylene Chloride	<0.07 ppm	25.00	50.00	
		Benzene	<0.07 ppm	1.00	0.50	
01/29/02	W14447.0	Methyl Chloride	<0.06 ppm	100.000	50.000	On asbestos warning sign immediate north of Room 28 door. About 4 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Toluene	0.33 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	

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Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
01/29/02	W14448.0	Methyl Chloride	<0.06 ppm	100.000	50.000	In Room 28 at northeast corner and 3 feet above sump.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/29/02	W14449.0	Methyl Chloride	<0.06 ppm	100.000	50.000	On emergency light fixture across aisle from Room 23 and about 3 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Toluene	0.08	200.000	50.000	
01/29/02	W14449.0	Benzene	<0.07 ppm	1.000	0.500	In Room 24 south of pilaster on west wall and about 4 feet above the floor.
		Methyl Chloride	<0.06 ppm	100.000	50.000	
		Chloroform	<0.06 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
01/29/02	W14451.0	Toluene	0.33 ppm	200.000	50.000	In Atoms room at southeast corner hanging on "Process Water" Valve about 4 feet above floor.
		Benzene	<0.07 ppm	1.000	0.500	
		Methyl Chloride	<0.06 ppm	100.000	50.000	
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
01/29/02	W14452.0	Methylene Chloride	<0.07 ppm	25.000	50.000	In Room 17 at northeast corner about 3 feet 6 inches above floor and about 14 inches south of north wall.
		Toluene	<0.06 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
		Methyl Chloride	<0.06 ppm	100.000	50.000	
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
01/29/02	W14453.0	Perchloroethylene	<0.04 ppm	100.000	25.000	In Room 10 about 14 inches west of east wall, about 4 feet 6 inches above floor and on center line of room in a north south direction.
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Toluene	0.33 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
		Methyl Chloride	<0.06 ppm	100.000	50.000	
		Chloroform	<0.05 ppm	10.000	10.000	



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Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
01/29/02	W14454.0	Methyl Chloride	<0.06 ppm	100.000	50.000	On fire alarm handle at bottom of west stairway about 3 feet from the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Toluene	<0.06 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/29/02	W14455.0	Methyl Chloride	<0.06 ppm	100.000	50.000	Room 12 door knob about 30 inches above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Toluene	<0.06 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/30/02	W14456.0	Methyl Chloride	<0.06 ppm	100.000	50.000	In Room 28 at north east corner 3 feet above sump.
		Chloroform	0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/30/02	W14457.0	Methyl Chloride	<0.06 ppm	100.000	50.000	On asbestos warning sign north of door to Room 28 and about 4 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Benzene	<0.07 ppm	25.000	50.000	
01/30/02	W14458.0	Methyl Chloride	<0.06 ppm	100.000	50.000	On emergency light fixture across hall from Room 23 and about 4 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Perchloroethylene	<0.07 ppm	1.000	0.500	
01/30/02	W144659.0	Methyl Chloride	<0.06 ppm	100.000	50.000	In Room 24 south side of pilaster on west wall about 4 feet above floor and 12 inches from west wall.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/30/02	W14460.0	Methyl Chloride	<0.06 ppm	100.000	50.000	inside Room 26 in southeast corner at sign with " Process Water Line about 4 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	

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Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
01/30/02	W14461.0	Methyl Chloride	<0.06 ppm	100.000	50.000	Inside Room 17 at the northeast corner about 14 inches south of north wall and about 4 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	10.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/30/02	W14462.0	Methyl Chloride	<0.06 ppm	100.000	50.000	In Room 10 about 14 inches west of east wall, on room's centerline in a north south direction and 4 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	10.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/30/02	W14463.0	Methyl Chloride	<0.06 ppm	100.000	50.000	6 feet south of Room 16 door and about 4 feet above the floor.
		Chloroform	<0.06 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	10.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
01/30/02	W14464.0	Methyl Chloride	<0.06 ppm	100.000	50.000	In Room 12 center of room and about 4 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/04/02	W14470.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In Room 28 about 4 feet above sump in northeast corner of room.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/04/02	W14467.0	Methyl Chloride	<0.06 ppm	100.000	50.000	Six feet south of Room 16 and about 3 feet above floor
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Benzene	<0.06 ppm	1.000	0.500	

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**Wichita, Kansas**

Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
02/04/02	W14465.0	Methyl Chloride	<0.05 ppm	100.000	50.000	On emergency light fixture 6 feet east of Room 23 and about 4 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.03 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
		Methyl Chloride	<0.05 ppm	100.000	50.000	
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.03 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/04/02	W14469.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In Room 16 at southeast corner about 3 feet above floor
		Chloroform	<0.04 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.03 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Toluene	<0.06 ppm	200.000	50.000	
		Benzene	<0.06 ppm	1.000	0.500	
02/04/02	W14468.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In Room 26 at the northeast corner about 4 feet above floor
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<4 ppm	25.000	50.000	
		Toluene	0.31 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/04/02	W14471.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In Room 27 in southeast corner on electrical transformer about 3 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/04/02	W14473.0	Chloroform	<0.04 ppm	10.000	10.000	In Room 21 in northeast corner about 3 feet above floor
		Carbon Tetrachloride	<0.03 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Benzene	<0.06 ppm	1.000	0.500	
02/04/02	W14472.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In Room 14 about 3 feet north of south wall about 3 feet above the floor and about 5 feet west of door
		Chloroform	<0.04 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.03 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	

**Table 2**  
**Occidental Chemical Corporation Administration Building**  
**Area Air Sample Monitoring Summary**  
**Wichita, Kansas**

Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
02/05/02	W14474.0	Methyl Chloride	<0.05 ppm	100.000	50.000	North of Room 28 door on asbestos warning sign about 4 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Toluene	<0.06 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/05/02	W14475.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In Room 28 at northeast corner about 4 feet above sump.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
02/05/02	W14475.0	Methylene Chloride	<0.06 ppm	25.000	50.000	On emergency light fixture across hall from Room 23 and about 3 feet above floor.
		Toluene	<0.06 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
		Methyl Chloride	<0.05 ppm	100.000	50.000	
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Toluene	<0.06 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/05/02	W14417.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In forms room 26 at northeast corner about 4 feet above floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.04 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Toluene	0.06 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/05/02	W14479.0	Methyl Chloride	<0.06 ppm	100.000	50.000	In Room 16 at the southeast corner about 3 feet 6 inches above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Toluene	0.30 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/05/02	W14478.0	Methyl Chloride	<0.06 ppm	100.000	50.000	Approximately 6 feet south of Room 16 and about 4 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.07 ppm	25.000	50.000	
		Toluene	0.31 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	

**Table 2**  
**Occidental Chemical Corporation Administration Building**  
**Area Air Sample Monitoring Summary**  
**Wichita, Kansas**

Date	Sample ID	Constituent	Result	Permissible Exposure Limit (ppm)	Threshold Limit (ppm)	Location
02/05/02	W14480.0	Methyl Chloride	<0.05 ppm	100.000	50.000	In Room 27 in southeast corner on electrical transformer about 3 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Toluene	0.33 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/05/02	W14481.0	Methyl Chloride	<0.05 ppm	100.000	50.000	On fire extinguisher cabinet across from room 14 and about 3 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Toluene	0.33 ppm	200.000	50.000	
		Benzene	<0.07 ppm	1.000	0.500	
02/05/02	W14482.0	Methyl Chloride	<0.05 ppm	100.000	50.000	On fire alarm signal at the bottom of west stairway. About 3 feet above the floor.
		Chloroform	<0.05 ppm	10.000	10.000	
		Carbon Tetrachloride	<0.04 ppm	10.000	5.000	
		Perchloroethylene	<0.03 ppm	100.000	25.000	
		Methylene Chloride	<0.06 ppm	25.000	50.000	
		Toluene	<0.06 ppm	200.000	50.000	